

1 **DAVID G. BANES, ESQ.**  
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**FILED**  
Clerk  
District Court

**JUL 26 2005**

5 **Attorneys for Plaintiffs**  
6 **Kenneth C. Cochran,**  
7 **Eric P. Cochran,**  
8 **and the minor child Achali K. Cochran,**  
9 **represented by Kenneth C. Cochran**

**For The Northern Mariana Islands**  
By \_\_\_\_\_  
(Deputy Clerk)

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **FOR THE NORTHERN MARIANA ISLANDS**

10 **KENNETH C. COCHRANE, ERICA P. ) CIVIL CASE NO. 05-0013**  
11 **COCHRANE, and ACHALI K. )**  
12 **COCHRANE, a minor child represented by )**  
13 **Kenneth C. Cochran, ) PLAINTIFFS' INITIAL**  
14 **) DISCLOSURES**  
15 **Plaintiffs, )**  
16 **vs. )**  
17 **FRANCISCO W. BORJA, )**  
18 **Defendant. )**

18 COMES NOW Plaintiffs by and through counsel, and for their Initial Disclosures  
19 Pursuant to Rule 26(a)(1), discloses as follows:

- 20
- 21 1. Disclosures pursuant to Federal Rule of Procedure 26(a) (1) (A).
- 22 a. Kenneth C. Cochran
- 23 c/o O'Connor, Berman Dotts & Banes
- 24 Witness to the accident
- 25 b. Erica P. Cochran
- 26 c/o O'Connor, Berman Dotts & Banes
- 27 Witness to the accident
- 28 c. Mr. Francisco W. Borja
- c/o G. Anthony Long
- Witness to the accident

ORIGINAL

1 d. The police personnel named on the police report.

2 e. Various personnel named in the related CHC medical records.

3 f. Plaintiff Erica Cochrane's medical treatment personnel: Marianas  
4 Medical Center; Dr. Tony Stearns; 7<sup>th</sup> Day Adventist Clinic; Anne Erhard; Steve Arthur; David  
5 Ahrens; Dr. Chan; Raising Sun Yoga; and University of Wisconsin Hospital.  
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8 2. Disclosures pursuant to Federal Rule of Procedure 26(a) (1) (B).  
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10 The following documents are currently available or will become available upon proper  
11 notification for inspection at the Law Offices of O'Connor Berman Dotts & Banes:  
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13 a. DPS Report dated December 12, 2003.

14 b. Various medical records and bills from CHC related to CHC's treatment  
15 of Plaintiffs.

16 c. Various medical records and bills from Marianas Medical Center; 7<sup>th</sup>  
17 Day Adventist Dental Clinic; Anne Erhard, psychologist; Steve Arthur, chiropractor; David  
18 Ahrens, massage therapist; Dr. Chan, acupuncture and massage; Raising Sun Yoga; and  
19 University of Wisconsin Hospital.

20 d. Release signed by Plaintiffs related to their claim for property damage.

21 e. CHC medical release dated July 21, 2005.  
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23 3. Disclosures pursuant to Federal Rule of Civil Procedure 26(a) (1) (C).  
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25 a. Plaintiffs are claiming pain and suffering and Plaintiff Erica Cochrane is  
26 also claiming lost wages.  
27  
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1           b.     However as Plaintiffs are still recovering from their injuries, their  
2 damages are still accruing, and Plaintiffs are attempting to obtain additional medical records  
3 and billings from the entities disclosed above. Plaintiffs reserve their right to supplement this  
4 disclosure.

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6           4.     Disclosures pursuant to Federal Rule of Civil Procedure 26(a) (1) (D).

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8           a.     Royal Crown has not yet produced a copy of the relevant insurance  
9 policy.

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11  
12 Dated: July 26th, 2005

O'CONNOR BERMAN DOTTS & BANES  
Attorneys for Plaintiffs Kenneth C. Cochrane,  
Erica P. Cochrane, and Achali K. Cochrane

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16 By:   
17       DAVID G. BANES  
18       CNMI Bar No. F0171  
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